

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

*In Re: Shale Oil Antitrust Litigation*

Case No. 1:24-md-03119-MLG-LF

This Document Relates to:

Judge Matthew L. Garcia

ALL ACTIONS

**JOINT STATUS REPORT**

Pursuant to the Court’s December 20, 2024 Initial Scheduling Order (ECF No. 82), Plaintiffs and Defendants (together, the “Parties”) submit this joint status report.

**I. Summary of Progress on Case**

**a. The Pleadings**

On January 10, 2025, Plaintiffs filed their Consolidated Class Action Complaint (ECF No. 86).<sup>1</sup> On February 24, 2025, Defendants filed: one joint motion to dismiss under Fed. R. Civ. P. 12(b)(1) and 12(b)(6) (ECF No. 129), eight individual motions to dismiss under Fed. R. Civ. P. 12(b)(2) and 12(b)(6) (ECF Nos. 123–27, 130–32), and one Request for Judicial Notice (ECF No. 128). Pursuant to the Initial Scheduling Order (ECF No. 82), Plaintiffs’ oppositions to Defendants’ motions to dismiss and request for judicial notice are due April 10, 2025, and Defendants’ reply briefs are due May 12, 2025.

On February 20, 2025, Plaintiff Matthew Foos filed a Notice of Voluntary Dismissal of his

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<sup>1</sup> Certain Plaintiffs in the underlying cases that were consolidated with the above-captioned case were not included in Plaintiffs’ Consolidated Class Action Complaint. The Parties are meeting and conferring about these Plaintiffs.

individual claims against all Defendants (ECF No. 100), which the Court memorialized on March 4, 2025 (ECF No. 107). On March 17, 2025, Plaintiff Green Acres Outdoor Services LLC filed a Notice of Voluntary Dismissal of its individual claims against all Defendants (ECF No. 148), which the Court memorialized on March 18, 2025 (ECF No. 149).

**b. Discovery**

On January 24, 2025, the Parties exchanged their Initial Disclosures. The Parties have exchanged: document retention and electronic device usage policies; draft discovery-related protocols including stipulated Electronically Stored Information (“ESI”), deposition, and expert discovery protocols; and a draft protective order. The Parties are continuing to negotiate these discovery protocols.

**II. Outstanding Disputes**

There are no outstanding disputes in which the Parties are at impasse.

**III. Settlement Discussions**

The Parties will advise the Court if assistance is needed in relation to any settlement discussions.

**IV. Motions and Other Matters the Parties Anticipate Addressing at Conference**

There are no motions or other matters that the Parties anticipate needing to address at the April 15, 2025 conference. Should the Court wish to set a hearing date for Defendants’ motions to dismiss and request for judicial notice, the parties will be prepared to discuss that matter.

JOINTLY SUBMITTED:

Dated: April 8, 2025

**SCOTT+SCOTT ATTORNEYS AT LAW  
LLP**

By: /s/ Patrick Coughlin

Patrick McGahan (*pro hac vice*)

Michael Srodoski (*pro hac vice*)

156 S Main Street

P.O. Box 192

Colchester, CT 06415

Tel: (860) 537-5537

pmcgahan@scott-scott.com

msrodoski@scott-scott.com

**SCOTT+SCOTT ATTORNEYS AT LAW  
LLP**

Karin E. Garvey (*pro hac vice*)

230 Park Ave., 24th Floor

New York, NY 11069

Tel: (212) 223-6444

kgarvey@scott-scott.com

**SCOTT+SCOTT ATTORNEYS AT LAW  
LLP**

Patrick J. Coughlin (*pro hac vice*)

Carmen Medici (*pro hac vice*)

Daniel J. Brockwell (*pro hac vice*)

Isabella De Lisi (*pro hac vice*)

600 W. Broadway, Suite 3300

San Diego, CA 92101

Tel: (619) 233-4565

pcoughlin@scott-scott.com

cmedici@scott-scott.com

dbrockwell@scott-scott.com

idelisi@scott-scott.com

**DODD LAW OFFICE, LLC**

Christopher A. Dodd

500 Marquette Avenue NW, Suite 1330

Albuquerque, New Mexico 87102

Tel: (505) 475-2932

chris@doddnm.com

*Liaison Counsel*

**COTCHETT, PITRE, & McCARTHY,  
LLP**

Karin B. Swope (*pro hac vice*)

Ellen Wen (*pro hac vice*)

1809 7<sup>th</sup> Avenue, Suite 1610

Seattle, WA 98103

Tel: (206) 778-2123

kswope@cpmlegal.com

ewen@cpmlegal.com

**COTCHETT, PITRE, & McCARTHY,  
LLP**

Joseph W. Cotchett (*pro hac vice*)

Adam Zapala (*pro hac vice*)

Vasti S. Montiel (*pro hac vice*)

840 Malcolm Road

Burlingame, CA 94010

Tel: (650) 697-6000

jcotchett@cpmlegal.com

azapala@cpmlegal.com

vmoniel@cpmlegal.com

**BERGER MONTAGUE PC**

Michael Dell'Angelo (*pro hac vice*)

Candice Enders (*pro hac vice*)

1818 Market Street

Suite 3600

Philadelphia, PA 19103

Tel: (215) 875-3080

mdellangelo@bm.net

**BERGER MONTAGUE PC**

Richard D. Schwartz (*pro hac vice*)

1720 W. Division

Chicago IL 20622

Tel: (773) 257-0255

rschwartz@bm.net

By: /s/ Boris Bershteyn

Boris Bershteyn  
Karen M. Lent  
Michael H. Menitove  
Zachary C. Siegler  
SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM LLP  
One Manhattan West  
New York, NY 10001-8602  
Tel: (212) 735-3000  
Boris.bershteyn@skadden.com  
Karen.lent@skadden.com  
Michael.menitove@skadden.com  
Zachary.siegler@skadden.com

Samuel G. Liversidge  
Jay P. Srinivasan  
S. Christopher Whittaker  
GIBSON, DUNN & CRUTCHER LLP  
333 South Grand Avenue  
Los Angeles, CA 90071-3197  
Tel: (213) 229-7000  
sliversidge@gibsondunn.com  
jsrinivasan@gibsondunn.com  
cwhittaker@gibsondunn.com

Eric R. Burris  
BROWNSTEIN HYATT FARBER  
SCHRECK, LLP  
201 Third Street NW, Suite 1800  
Albuquerque, NM 87102-4386  
Tel: (505) 244-0770  
eburris@bhfs.com

*Attorneys for Defendant*  
*PIONEER NATURAL RESOURCES*  
*COMPANY*

By: /s/ Benjamin F. Feuchter

Benjamin F. Feuchter  
Thomas C. Bird  
JENNINGS HAUG KELEHER MCLEOD  
201 Third Street NW, Suite 1200  
Albuquerque, NM 87102  
Tel: (505) 346-4646  
bf@jkhkmlaw.com  
tcb@jkhkmlaw.com

John M. Taladay  
Christopher Wilson  
Kelsey Paine  
Megan Tankel  
Fran Jennings  
BAKER BOTTS L.L.P.  
700 K Street NW  
Washington, D.C. 20001-5692  
Tel: (202) 639-7909  
john.taladay@bakerbotts.com  
christopher.wilson@bakerbotts.com  
kelsey.paine@bakerbotts.com  
megan.tankel@bakerbotts.com  
fran.jennings@bakerbotts.com

*Attorneys for Defendant*  
*EOG RESOURCES, INC*

By: /s/ Benjamin Allison

Benjamin Allison  
Billy Trabaudo  
BARDACKE ALLISON MILLER LLP  
P.O. Box 1808  
141 E. Palace Avenue  
Santa Fe, NM 87501  
Tel: (505) 995-8000  
ben@bardackeallison.com  
billy@bardackeallison.com

Jeffrey L. Kessler  
Jeffrey J. Amato  
WINSTON & STRAWN LLP  
200 Park Avenue  
New York, NY 10166  
Tel: (212) 294-6700  
jkessler@winston.com  
jamato@winston.com

Thomas M. Melsheimer  
Thomas B. Walsh, IV  
WINSTON & STRAWN LLP  
2121 N. Pearl Street, Suite 900  
Dallas, TX 75201  
Tel: (212) 294-6700  
tmelsheimer@winston.com  
twalsh@winston.com

*Attorneys for Defendant*  
*DIAMONDBACK ENERGY, INC*

By: /s/ Marguerite M. Sullivan

Marguerite M. Sullivan  
LATHAM & WATKINS LLP  
555 Eleventh Street, N.W., Suite 1000  
Washington, D.C. 20004  
Tel: (202) 637-2200  
Marguerite.Sullivan@lw.com

Lawrence E. Buterman  
LATHAM & WATKINS LLP  
1271 Avenue of the Americas  
New York, NY 10020  
Tel: (212) 906-1200  
Lawrence.Buterman@lw.com

*Attorneys for Defendant*  
*EXPAND ENERGY CORPORATION*  
*(F/KA/ CHESAPEAKE ENERGY*  
*CORPORATION)*

By: /s/ Benjamin E. Thomas

Benjamin E. Thomas  
RODEY, DICKASON, SLOAN, AKIN &  
ROBB, P.A.  
201 3rd Street NW, Suite 2200  
Albuquerque, New Mexico 87102  
Tel.: (505) 765-5900 / Fax: (505) 768-7395  
bthomas@rodey.com

Kevin S. Schwartz  
David A. Papirnik  
WACHTELL, LIPTON, ROSEN & KATZ  
51 West 52nd Street  
New York, NY 10019  
Tel: (212) 403-1062  
kschwartz@wlrk.com  
dapapirnik@wlrk.com

*Attorneys for Defendant*  
*HESS CORPORATION*

By: /s/ Earl E. DeBrine, Jr.

Earl E. DeBrine, Jr.  
MODRALL SPERLING  
500 4th St. NW, Suite 1000  
Albuquerque, NM 87102  
Tel: (505) 848-1800  
earl.debrine@modrall.com

Devora W. Allon  
KIRKLAND & ELLIS LLP  
601 Lexington Avenue  
New York, NY 10022  
Tel: 212-446-5967  
devora.allon@kirkland.com

Jeffrey J. Zeiger  
KIRKLAND & ELLIS LLP  
333 West Wolf Point Plaza  
Chicago, IL 60654  
Tel: 312-862-3237  
jzeiger@kirkland.com

*Attorneys for Defendant  
OCCIDENTAL PETROLEUM  
CORPORATION*

By: /s/ Christopher E. Ondeck

Christopher E. Ondeck  
Stephen R. Chuk  
PROSKAUER ROSE LLP  
1001 Pennsylvania Avenue NW  
Washington, DC 20004  
Tel: (202) 416-6800  
condeck@proskauer.com  
schuk@proskauer.com

Kyle A. Casazza  
PROSKAUER ROSE LLP  
2029 Century Park East, Suite 2400  
Los Angeles, CA 90067-3010  
Tel: (310) 284-5677  
kcasazza@proskauer.com

Jared DuBosar  
PROSKAUER ROSE LLP  
2255 Glades Road, Suite 421 Atrium  
Boca Raton, FL 33431  
Telephone: (561) 995-4702  
jdubosar@proskauer.com

Michael Burrage  
WHITTEN BURRAGE  
512 North Broadway Avenue, Ste 300  
Oklahoma City, OK 73102  
Tel: (888) 783-0351  
mburrage@whittenburrage.com

H. Brook Laskey  
Kevin J. Banville  
317 Commercial St. NE, Suite 200  
Albuquerque, NM 87102  
Telephone: (505) 246-0455  
blaskey@MLLlaw.com  
kbanville@MLLlaw.com

*Attorneys for Defendant  
CONTINENTAL RESOURCES, INC*

By: /s/ Michael W. Scarborough  
Michael W. Scarborough  
Dylan I. Ballard  
VINSON & ELKINS LLP  
555 Mission Street, Suite 2000  
San Francisco, CA 94105  
Tel: (415) 979-6900  
mscarborough@velaw.com  
dballard@velaw.com

Craig P. Seebald  
Stephen M. Medlock  
VINSON & ELKINS LLP  
2200 Pennsylvania Avenue NW, Suite 500 West  
Washington, DC 20037  
Tel: (202) 639-6500  
cseebald@velaw.com  
smedlock@velaw.com

*Attorneys for Defendant*  
*PERMIAN RESOURCES CORPORATION*